REMARKS

Claims 1-11 are all the claims pending in the present application. Claims 1, 3, and 4 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Gloe (U.S. Patent Application Publication No. 2004/0083306). Claims 5, 6, and 8-11 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Koodli et al. (U.S. Patent Application Publication No. 2004/0081122). Claim 2 is rejected under 35 U.S.C. § 103 (a) as allegedly being unpatentable over Gloe in view of Uematsu (U.S. Patent Application Publication No. 2002/0075836). Finally, claim 7 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Koodli in view of Uematsu.

§ 102(e) Rejections (Gloe) - Claims 1, 3, and 5

Claims 1, 3, and 4 are rejected based on the reasons set forth on pages 2-3 of the present Office Action. Applicants traverse these rejections at least based on the following reasons.

A brief description of Gloe is as follows.

Gloe is directed to an invention in which a host node connected to the Internet automatically generates an Internet interface addresses for itself, and automatically generates a request to an Internet domain name server to update the domain name server's database with the self-generated address. Preferably, the node employs a draft standard stateless address autoconfiguration protocol to create a link-local address, find a router, obtain a prefix from the router, and generate a global address from the prefix and the link-local address. Preferably, the node automatically determines the identity of its master domain name server, and transmits a request to update the master's database using a BIND 8 (or subsequent) protocol. Such a request may be encrypted for security and may include a self-generated identity key for further security. *See Abstract to Gloe.*

With respect to independent claim 1, Applicants submit that Gloe does not disclose or suggest at least, "determining whether a collision of the IP address occurs using a DAD timer handler," as recited in claim 1. The Examiner cites Fig. 4, and numbered paragraphs 41, 87, 92 and 114 of Gloe as allegedly satisfying this particular feature. One of the cited portions of Gloe mentions a timer that indicates a delay between consecutive neighbor solicitation transmissions performed during duplicate address detection; the timer also indicates the time a node waits after sending the last neighbor solicitation before ending the duplicate address detection process. However, there is no teaching or suggestion that the timer mentioned in numbered paragraph 154 of Gloe, for example, is used to determine whether a collision of the IP address occurs. Therefore, at least because this particular feature is not satisfied by Gloe, Applicants submit that Gloe does not anticipate claim 1.

Applicants submit that dependent claims 3 and 4 are patentable at least by virtue of their respective dependencies from independent claim 1.

§ 102(e) Rejections (Koodli) - Claims 5, 6, and 8-11

Claims 5, 6, and 8-11 are rejected based on the reasons set forth on pages 3-4 of the present Office Action. Applicants traverse these rejections at least based on the following reasons.

A brief description of Koodli is as follows.

Koodli is directed to an apparatus, system, and method for managing connectivity in a network by expediting the ability of a mobile node to send Internet Protocol (IP) packets subsequent to a handover. The mobile node is configured to determine an unconfirmed address for use on an access router. Upon establishing a link-layer connection, and before establishing a network-layer connection with the access router, the mobile node employs the unconfirmed address to send an IP packet to the access router. Employing the unconfirmed address prior to

network-layer connectivity enables the reduction of handover latencies. If the access router determines that the unconfirmed address conflicts with an existing address, the access router provides a message to the mobile node indicating the conflict in addresses. In response to the message, the mobile node performs actions to resolve the address conflict. *See Abstract of Koodli.*

With respect to independent claim 5, Applicants submit that Koodli does not disclose or suggest at least, "(e) sending the advisory IP address to the terminal," as recited in claim 5. The Examiner cites numbered paragraph 56 of Koodli as allegedly satisfying the above-quoted feature of claim 5. The cited portion of Koodli describes the process decision block 308 set forth in Fig. 3, in which a determination is made about whether a confirmation is received for an unconfirmed address before the transmit timer expires. If it is determined that a confirmation is received before expiration of a transmit timer, the process can proceed to block 310. Nowhere is there teaching or suggestion that an advisory IP address is sent to a terminal. The normal address, which the Examiner believes corresponds to the advisory address, is only indicated as being set to a confirmed address for use in subsequent packets. There is no teaching or suggestion that this normal address is sent to a terminal. Therefore, at least based on the foregoing, Applicants submit that Koodli does not anticipate claim 5.

Applicants submit that dependent claims 6 and 8-11 are patentable at least by virtue of their respective dependencies from independent claim 5.

Further, with respect to claim 6, the Examiner cites numbered paragraph 32 of Koodli as allegedly satisfying the features of claim 6. Numbered paragraph 32 teaches, in part, that an unconfirmed address may be obtained by way of a proxy router advertisement, a server, or the

like, while connected to a current access router. Nowhere is it taught or suggested that a terminal allocates the tentative IP address to itself.

Further, with respect to dependent claim 11, Applicants submit that Koodli does not disclose or suggest at least, "wherein a neighboring mobile terminal selects the advisory IP address," as recited in amended claim 11. The Examiner cites Fig. 2 in numbered paragraphs 46-48 of Koodli as allegedly satisfying the features of claim 11. The cited portion of Koodli only discloses that:

> A neighbor discovery (ND) cache 202 includes software and related hardware for storing information such as active IP addresses and their corresponding link-layer addresses employed on an interface of access router 200. ND cache 202 may employ a cache, Random Access Memory (RAM), a database, or the like, and software for managing the stored information.

The ND cache 202 constitutes a router 200 as shown in Fig. 2. There is no teaching or suggestion that a neighboring mobile terminal selects the advisory IP address. Therefore, at least based on the foregoing, Applicants submit that Koodli does not anticipate claim 11.

§ 103(a) Rejections (Gloe/Uematsu) - Claim 2

Applicants submit that claim 2 is patentable at least by virtue of its dependency from independent claim 1. Uematsu does not make up for the deficiencies of Gloe.

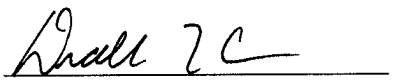
§ 103(a) Rejections (Koodli/Uematsu) - Claim 7

Applicants submit that claim 7 is patentable at least by virtue of its dependency from independent claim 5. Uematsu does not make up for the deficiencies of Koodli.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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